



United States Department of Justice

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May 14, 2024

Via ECF

Hon. Daniel J. Stewart
United States Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 314
Albany, New York 12207

Re: *United States v. Michael Mann, Crim. Case No. 20-CR-199 (LEK) (DJS)*

Dear Judge Stewart:

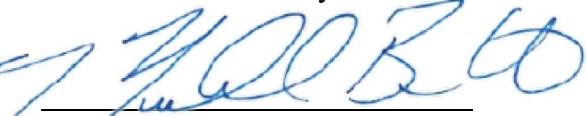
Following up on the topic of phased discovery raised at the May 7 status conference, I write to inform the Court that the parties recommend that discovery be initially limited to the tracing and sources of all funds at issue in both third-party petitions, including:

1. The tracing and sources of the funds that entered the three Bank of America (“BoA”) accounts whose funds the Government seized; and
2. The tracing and sources of the funds relating to Cachet and Pioneer’s respective claims, including the funds traceable to the 36 BoA checks that are the basis of Pioneer’s claim.

The Government is preparing a proposed order, for the Court’s consideration, that would allow the sharing of records relevant to these matters that are already in the Government’s possession.

Respectfully submitted,

CARLA B. FREEDMAN
United States Attorney

By: 

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